

ORIGINAL

U S WEST, Inc.
Suite 700
1020 Nineteenth Street, NW
Washington, DC 20036
202 429-3134
FAX 202 296-5157

EX PARTE OR LATE FILED

USWEST

Elridge A. Stafford
Executive Director-
Federal Regulatory

December 22, 1999

WRITTEN EX PARTE

RECEIVED

DEC 22 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 - 12th Street, SW, TW-A325
Washington, DC 20554

RE: Calling Party Pays Service, WT Docket No. 97-207

Dear Ms. Salas:

The attached letter was sent today to Mr. Thomas Sugrue of the Wireless Telecommunications Bureau. In accordance with Commission Rule 1.1206(b)(1), the original and one copy of this transmittal and the attached letter are being filed with your office for inclusion in the public record of the above proceeding.

Acknowledgment and date of receipt of this submission are requested. A duplicate of this letter is attached for this purpose.

Please call if you have any questions.

Sincerely,

Elridge Stafford

Attachment

Copy w/o Attachment:
Mr. Thomas Sugrue

No. of Copies rec'd _____
List ABCDE _____

01/

U S WEST, Inc.
Suite 700
1020 Nineteenth Street, NW
Washington, DC 20036
202 429-3134
FAX 202 296-5157

USWEST

Elridge A. Stafford
Executive Director-
Federal Regulatory

December 22, 1999

Thomas J. Sugrue, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 Twelfth Street, SW, Room 3-C252
Washington, D.C. 20554

RECEIVED
DEC 22 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Calling Party Pays Service, WT Docket No. 97-207

Dear Mr. Sugrue:

The purpose of this letter filing is to clarify why U S WEST Communications (U S WEST) believes the line information database (LIDB) is a better tool for identifying calling party pays (CPP) calls that require special handling than Flexible Automatic Number Identification (Flex ANI). As U S WEST stated in its comments, to the extent CMRS providers want to know attributes about the originating caller for their call processing or billing purposes, they should be expected to take advantage of existing LEC offerings and tools to secure that information. For reasons discussed below, for U S WEST that tool would be the Line Information Database (LIDB), and not Flex ANI.

Fundamentally, U S WEST believes its LIDB is a better tool than Flex ANI because it is much more versatile. U S WEST's LIDB already has the capability to identify and screen calls originated from a large variety of line and service categories, including payphones. On the other hand, U S WEST believes Flex ANI is much less versatile and its use today is much more limited. In U S WEST, with the exception of a handful of central offices, Flex ANI is only used to identify calls originating from payphones.

Background

LIDB

LIDB is a validation database that contains information about all valid telephone and calling card numbers of a carrier. LIDB is accessible via the SS7 common channel signaling system. Originating Line Number Screening (OLNS) is a LIDB application that allows U S WEST to make available originating screening profiles.

An originating screening profile identifies information that affects originating call processing and billing decisions as well as originating service processing. These profiles identify the type of service or equipment associated with the line originating the call. There are currently 42 different indicators which distinguish between Coin and Coinless lines, residence and business lines, PBX lines, centrex lines, prison inmate telephones, hospital room telephones, WATS lines, as well as other line types. OLNS provides the most robust originating screening profiles of all the originating line screening technologies. Among the line attributes OLNS

will make available are: service or equipment indicators, billing or service restrictions, and treatment indicators which indicate special treatment, such as attach the call to an operator (e.g., because the end user has a physical impairment).

A carrier subscribing to LIDB service queries the database and receives information back via an SS7 connection. The information received from the database can be used in real-time by the carrier, whether an interexchange carrier (IXC) or a commercial mobile radio service provider offering CPP, to determine how to process and bill the call (e.g., billing to the originating line or credit card charge). In this manner, when used to support CPP, OLNS service can be used to identify calls originating on many types of lines, including payphones, hotel/motels, PBXs, inmate payphones, and others that would otherwise be difficult to bill to the caller.

Flex ANI

Flex ANI provides additional two-digit ANI identifiers or information digits and, through appropriate translations, permits the association of these additional digits with specific calling party classes of service. These information digits provide information, along with the calling party's directory number, which is useful for billing and paying compensation. The Flex ANI coding digits are transmitted from the end office as part of the ANI signaling sequence associated with the carrier's FG-D service, and are used by the receiving switch to identify the type of originating line or the type of call being made.¹

Rather than reside in a centralized database, as is the case for LIDB, Flex ANI information resides in each end office switch on a class of service and CIC code basis. The particular Flex ANI coding digits must be activated in each switch, assigned on each line to be screened, and programmed for each CIC for which it is requested. Each carrier that uses Flex ANI must purchase FG-D service and be assigned a CIC. (Cellular and PCS carriers typically use either Type IIA or IIB connections to a local exchange carrier's (LEC) network.) Flex ANI is costly to implement and very costly to modify or expand.² Although Flex ANI was available as a tariffed service prior to the Commission's payphone decisions, there was little or no demand for it. As a consequence, it was not widely deployed by U S WEST. Pursuant to the Commission's requirements, Flex ANI currently must be provided by LECs, such as U S WEST, to permit IXCs to identify calls originating from payphones for the purpose of tracking compensable calls.

¹ See FCC Memorandum Opinion and Order, CC Docket No. 96-128, released March 9, 1998, footnote 8.

² To expand Flex ANI for classes of service other than payphone access lines, U S WEST would, at a minimum, incur the following types of costs: complex translations expense to program the multitude of line class codes changes in end office switches (over 100 new line class codes were required for payphones), translations expense to turn up the CMRS CICs for Flex ANI, service order processing costs to change existing line class codes to new Flex ANI line class codes, network testing costs, customer notification costs for when feature is available on an end office basis. It is also likely that capital investment for generic upgrades would be required.

Only as a result of the Commission's payphone orders is a limited version of Flex ANI now widely deployed within U S WEST's service area. However, this widespread deployment is for the sole purpose of enabling IXC's to use Flex ANI to identify compensable calls from payphones. And, although the Commission ordered local exchange carriers to deploy Flex ANI, contrary to statements made by the American Public Communications Council (APCC),³ it did not require that IXC's use Flex ANI. The use of Flex ANI by IXC's is completely discretionary.⁴ APCC also states that there would be no additional cost to require Flex ANI as part of the CPP rules. This also is not correct. As described in the previous section, substantial cost would be incurred by carriers if they were required to make Flex ANI available for CPP. Furthermore, and again contrary to statements made by APCC, Flex ANI is only available to carriers at no charge if it is being used solely for purposes of payphone compensation. The payphone compensation paid by IXC's to PSPs includes an adjustment to reimburse PSPs for Flex ANI.

It is also useful to point out that other commenters besides U S WEST suggested that LIDB could be helpful in identifying certain CPP calls.⁵ But APCC appears to be alone in suggesting Flex ANI for this purpose.

For the foregoing reasons, U S WEST believes that in its service area LIDB can be a useful tool to assist CPP providers in determining the appropriate billing treatment for incoming CPP calls and that Flex ANI is not useful in this respect. More importantly, beyond a national notification, U S WEST believes that the Commission need not become involved in other CPP issues such as call screening and billing. These matters should be left to the industry.

Please contact me if you have any questions on this matter.

Sincerely,



Elridge Stafford
Executive Director - Federal Regulatory

cc: Nancy Boocker

³ See APCC Reply Comments at 4 and 5.

⁴ See FCC Report and Order, CC Docket No. 96-128, released September 20, 1996, paragraph 97.

⁵ See Illuminet Comments at 2-5, Nortel at 7-10.